Central Intelligence Agency
Approved for Release: 2018/03/26 C05496173

Washington, D.C. 20505

[redacted] 10/4/02

27 September 2002

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Dr. Michael J. Kurtz
Assistant Archivist for
Records Services - Washington, D.C.
National Archives and Records Administration
8601 Adelphi Road
College Park, Maryland 20740-6001

Dear Dr. Kurtz:

(U) Enclosed is our progress report pertaining to the recommendations you made in your March 2000 Evaluation Report of Records Management in the Central Intelligence Agency. This response focuses on those recommendations you indicated are not yet closed. Also, enclosed is a list of the attachments we are sending to you in an accompanying notebook. These attachments, some of which are classified, are exemplars of material requested and/or evidence of our actions to satisfy open recommendations.

(b)(3) (U) If you have questions, please contact [redacted] (b)(3)
Chief of the Records and Classification Management Group, or me. We strongly recommend a meeting to discuss any unsatisfied recommendations
(b)(3) prior to a response letter. [redacted] can be reached on [redacted] (b)(3)
my number is [redacted]

Sincerely,

(b)(3)
(b)(6) [redacted]

Deputy Director,
Information Management Services

(U) Enclosures:
A. September 30, 2002, Progress Report on the March 2000 NARA Evaluation of CIA Record Keeping Practices
B. List of Attachments

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Enclosure A

September 30, 2002, Progress Report on the March 2000 NARA Evaluation of CIA Record Keeping Practices

- **Recommendation I/1:**

(U) Ensure that there are sufficient IMOs in both OIT and the Directorates to implement the recommendations in this report.

(U) Review workloads and staffing levels to determine whether or not IMOs should be assigned to organizations where day-to-day records management duties are currently handled by POCs.

CIA Response:

(U//~~FOUO~~) Information Management Services (CIO/IMS) provides IMO support in each directorate, including the Directorate of Operations, and the DCI and MSO areas. IMS periodically reviews the level of IMO support needed. Indeed, we currently are conducting a zero base review of these information management positions to ensure that we understand current workloads and can adjust staffing levels as appropriate. In the last eighteen months, we have added [ ] IMO positions. New IMOs have professional degrees and experience in library, information, and archival science, records management, information technology, and business. We will continue to monitor the IMO needs of the organization and adjust our IM workforce accordingly.

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(U//~~FOUO~~) You expressed concern in your 23 October 2001 letter about over-reliance on Proactive Electronic Records Management (PERM) and asked what steps are being taken to ensure that records being created in non-PERM organizations are being handled properly. We have been sensitive to this issue and our component IMOs, as a major part of their responsibilities, have worked to ensure proper management of paper records in these components. We are pleased to note, however, that PERM has the full

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endorsement of the Agency Chief Information Officer (CIO) and already has been deployed to over 1600 officers. The PERM application is scheduled to be on every workstation by the close of FY2004. PERM will be the electronic repository for all electronic records not already captured in another approved system. The electronic record keeping system (ERKS) certification process (which complies with DoD 5015.2) will assure the integrity, authenticity, and preservation of electronic records outside of PERM.

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(U//~~FOUO~~) We have also provided a copy of the 14 June 2000 presentation to the Directorate of Administration Corporate Board (attachment #2) on the Agency records management program, as you requested.

- **Recommendation I/2**:

(U) After they have completed agency-required records management training classes, require IMOs to periodically take additional training to ensure their familiarity with records issues, policies, and procedures.

CIA Response:

(U//~~FOUO~~) In response to the request in your 23 October 2001 letter, we have enclosed a copy of the

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curriculum each IMO currently is required to take. You should also know that we have formed an Agency Information Management Occupational Council (AIMOC) that is updating and refining the skills and competencies required of our IMOs. IMS established a curriculum board to identify the training needed under the AIMOC structure; the revised FY'02 and '03 course schedules (attachments #4 and 5) are included.

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- **Recommendation I/3:**

(U) Develop a one-day course dealing with record keeping responsibilities of program staff including the application of approved records schedules to their files and basic records concepts such as distinguishing records from non-record materials.

CIA Response:

(U//~~FOUO~~) Instead of developing a one-day course on records management for all employees, our training is ongoing and continuous throughout the year and throughout the employee's career with CIA. This is accomplished in three ways. First, IMOs provide records management training at major Agency courses, such as Entrance on Duty training, training given after the probationary period, at the mid-career course, etc. Second, we have developed records and classification management Computer Based Training (CBT) that all employees will be required to take each year. Third, our IMOs provide tailored briefings to components annually and as needed to address Records Management issues. These tailored briefings, given as frequently as the component IMO believes is necessary, cover a wide variety of topics, including: the Agency File Plan and record control schedules, the Electronic Record Keeping System (ERKS) certification requirements, electronic records categorization, the Agency Classification Guide, NARA evaluation recommendations, forwarding records to NARA, archive media conversion, supplies management, the Agency and Intelligence Community Metadata Standards, Proactive Electronic Records Management System (PERM) roll-out, and Agency forms management.

(U//~~FOUO~~) We continue to work with the program managers of the annual INFOSEC and ETHICS courses for the appropriate inclusion of information on an employee's records management responsibilities. However, an expanded CBT program on records management will likely be the preferred way to deliver mandatory records training.

(U//~~FOUO~~) We include a compact disc of our current CBT program (attachment #6) and samples of records

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management presentations made in Agency courses and at the component level (attachments #7-#12).

- **Recommendation I/7:**

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CIA Response:

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- **Recommendation II/1:**

(U) Ensure that employees, including Deputy Directors and other high-level decision makers, are aware of requirements in Federal law and regulation to document and maintain in appropriate files all policy and

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decision-making actions, including those discussed via electronic mail (e-mail) or during telephone conversations.

CIA Response:

(U//~~FOUO~~) To address your recommendations, we have our draft Employee Bulletin (attachment #17) providing guidance for CIA employees and managers on: the definition of a record, treatment of personal papers, guidance on working files as records, handling databases and other electronic records, and identifying the types of documents that could potentially serve as records at CIA. We are providing you with a copy of that draft and will publish it after your review.

(U//~~FOUO~~) You also ask about the IMO-provided tailored briefings; please see attachments #7-#12.

(U//~~FOUO~~) Finally, you ask for a copy of the memorandum "Records Responsibilities of Senior Officials of the Central Intelligence Agency"; please see attachment #18.

- **Recommendation II/1a:**

(U) E-mail communications that meet the definition of records should be retained in a record keeping system.

CIA Response:

(U//~~FOUO~~) CIA has drafted a new Employee Bulletin (attachment #17) to address the proper use of e-mail on Agency systems.

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- **Recommendation II/1b:**

(U) Telephone conversations should be documented through memoranda to the file.

CIA Response:

(U//~~FOUO~~) CIA has drafted guidance for documenting telephone conversations and creating memorandums of conversation.

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- **Recommendation II/2:**

(U) Ensure that employees follow CIA guidance requiring the creation and maintenance of files to document agency activities.

CIA Response:

(U//~~FOUO~~) Per our response to Recommendation I/3 above, we have included exemplars of the types of briefings given annually (or more frequently, as needed) to employees regarding record keeping responsibilities (attachments #7-#12). Our CBT training (attachment # 6) also provides guidance to all employees on proper record keeping practices. The CBT is being updated and will be redeployed to the employee desktop in FY2003.

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- **Recommendation II/3:**

(U) Monitor the implementation of the Agency File Guide to ensure that it is effective and meets the needs of the Directorates.

CIA Response:

(U//~~FOUO~~) The Agency File Plan was developed by arranging each of the record control items covered in the existing Agency-unique and appropriate General Records Schedule items into a taxonomy. The taxonomy (file plan) not only represents Agency activities (and associated records), but also attaches (assigns) the disposition to each record "filed" to one of the categories (record series) in the plan. The Agency File Plan, used in electronic and non-electronic record keeping systems, is the sum of all RCS items approved by NARA for the disposition of Agency records arranged in a hierarchical scheme. The Agency File Plan is under strict configuration management. However, as new record series are identified and dispositions authorized, the file plan will be amended accordingly. We have included a draft copy of the Agency File Plan. We are assigning one disposition with each 3rd level tag prior to the disposition of any records associated with the file plan. The final plan will be forwarded to NARA for review; a current draft is attached (attachment #23).

(U//~~FOUO~~) The relationship between the Agency File Plan and PERM is a close one. PERM is an application that allows for classification, categorization, and filing of records originated or received at an employee's workstation. PERM incorporates Federal regulations as well as directives and business rules established by the Intelligence Community and CIA. In the classification arena, the instructions and guidance can be found in the Agency Classification Guide, Intelligence Community Classification and Control Marking Register and Executive Order 12958.

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For records management, the rules are incorporated into the Agency File Plan that follows the Code of Federal Regulations, Title V for FOIA and Privacy Act, General and Agency records schedules, et. al.

(U//~~FOUO~~) The enclosed document "Agency File Plan and PERM Overview and Demonstration" (attachment #24), dated 22 November 2000, illustrates the strong relationship between the Agency File Plan and PERM.

- **Recommendation II/4:**

(U) Ensure that adequate indexes are created where necessary and that staff who need to use them have familiarity with them.

CIA Response:

(U//~~FOUO~~) One of the functions of our component IMOs is to ensure that their component maintains the indices it needs to find records, and that these indexes are effective, accurate, and properly preserved.

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In addition, both the Agency information technology governance process and the ERKS certification requirements (attachment #25) ensure that records systems will develop, maintain, and preserve effective finding aids.

- **Recommendation II/5:**

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CIA Response:

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- **Recommendation II/6:**

(U) Inspect new accessions retired to the ARC to ensure that records are scheduled properly and to identify any preservation problems and needs, including compliance with CIA regulations concerning the use of acid-free folders for permanent series.

(U) This review can either be conducted by component IMOs prior to shipment of records or by ARC staff as part of the accessioning process.

CIA Response:

(U//~~FOUO~~) The "Permanent Retirement Job Quality Control/Preservation Checklist" used at the ARC for accessioning both temporary and permanent records has been renamed the "Permanent/Temporary Job Quality Control/Preservation Checklist" (attachment #26). The checklist is used to verify both temporary and permanent deposits to the ARC. Directorate and component IMOs verify the RCS on each job (accession) prior to its transfer to the ARC. ARC personnel verify the adequacy of the shelflist, the preparation of the accession, including compliance with appropriate preservation techniques, among others. Deficiencies with an accession are corrected by ARC personnel. If the deficiencies cannot be resolved at the ARC, the job (accession) is returned to the Directorate IMO, who makes the necessary corrections and provides appropriate training to the preparer.

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- **Recommendation II/7:**

(U) Continue and extend the ARC preservation project. Implement a preservation project for older records held in locations other than the ARC.

CIA Response:

(U//~~FOUO~~) We appreciate NARA's recognition that substantial progress was made with this recommendation. With respect to your request for further information about preservation, this year the ARC will conduct a 1% sample of all microform records. We will review 1066 cubic feet of permanent records now at the ARC and review all records accessioned by the ARC or removed and returned to the ARC to ensure their proper preservation. We also plan to transfer our early generation audio/visual material to NARA this calendar year; the ARC is considering conversion options for this material. Finally, with respect to records maintained in a component, rather than at the ARC, the component IMOs are responsible for taking appropriate preservation action.

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Please see our Employee Bulletin on Non Textual Records Preservation (attachment #29).

- **Recommendation II/8:**

(U) Continue the recent initiatives to revitalize the vital records program. Ensure that

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IMOs continue reviewing older vital records in the ARC, and identifying more recent vital records.

CIA Response:

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(U//~~FOUO~~) The Agency regularly reviews and updates vital records and updates and documents its disaster

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(b)(3) and vital records inventory.

[redacted]

- **Recommendation II/9**:

  (U) Consider conducting a mock emergency preparedness drill to ensure that, in an emergency, records are easily retrievable, all equipment needed to read the records is available, and that system documentation is adequate to operate any system that contains vital records.

  CIA Response:

  (U//~~FOUO~~) The Agency validated its existing vital and disaster recovery procedures.

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- **Recommendation III/1:**

  (U) Review full text and skeleton schedules for declassification; provide full text schedules to NARA even if portions are security classified.

  CIA Response:

  (U//~~FOUO~~) You have asked us to review for declassification the full text of the Agency records control schedule. This review should be completed by the end of calendar year 2002.

- **Recommendation III/2:**

  (U) Submit schedules for all unscheduled series, including series where records are now maintained electronically, particularly permanent series where paper documents are no longer printed out and filed.

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CIA Response:

(U//~~FOUO~~) In keeping with NARA's recommendation, if unscheduled series are found, they will be submitted to NARA for a disposition determination. The Electronic Record Keeping System process (ERKS) will ensure that all electronic record keeping systems at CIA are compliant with federal record keeping standards. The maintenance of specific files series, mentioned in your 23 October 2001 letter and in the third chapter of the NARA evaluation, are addressed below. Where specific records schedule items are cited, we have included those schedules. If there are other systems or series that need addressing, please bring them to our attention.

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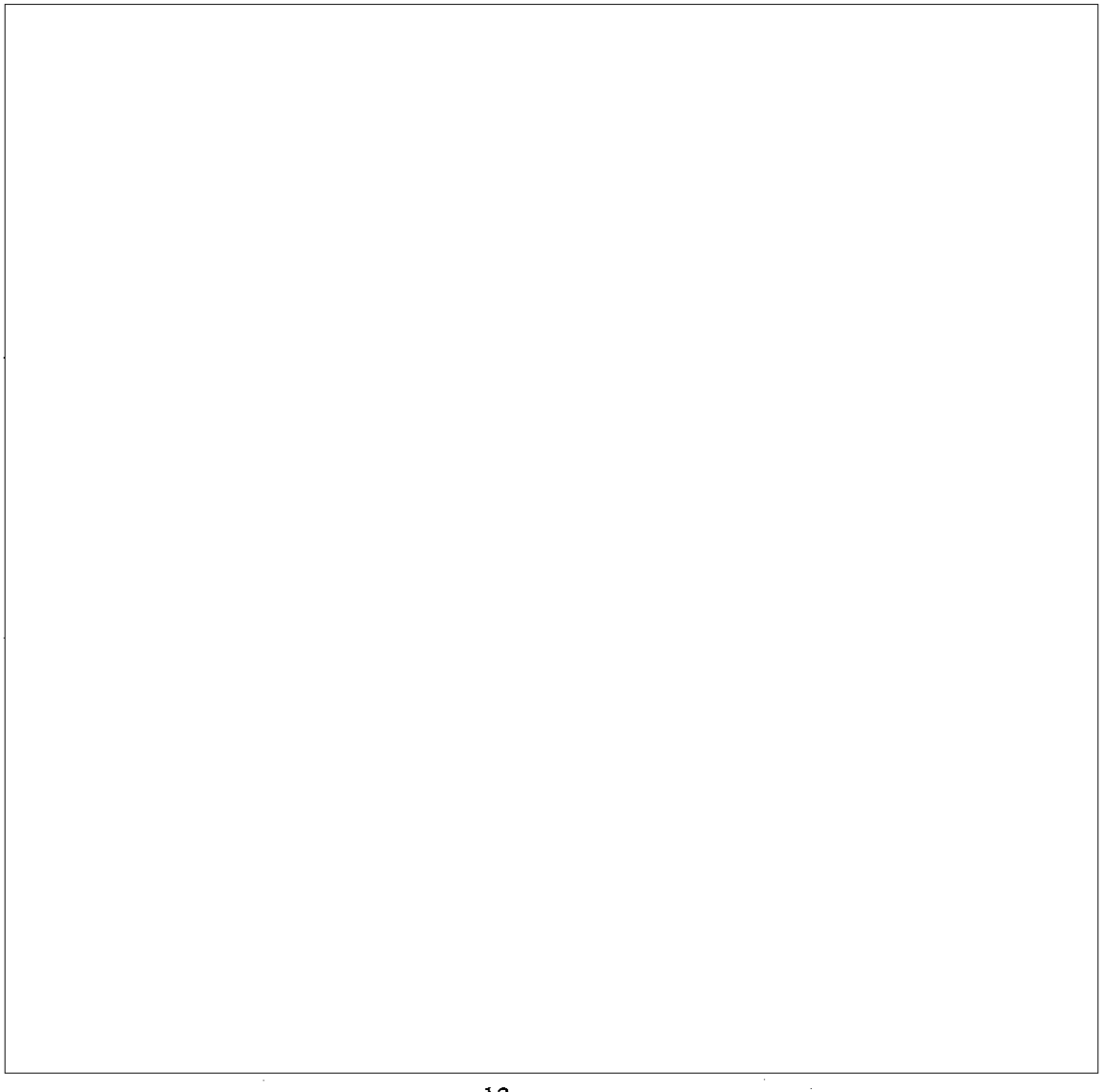

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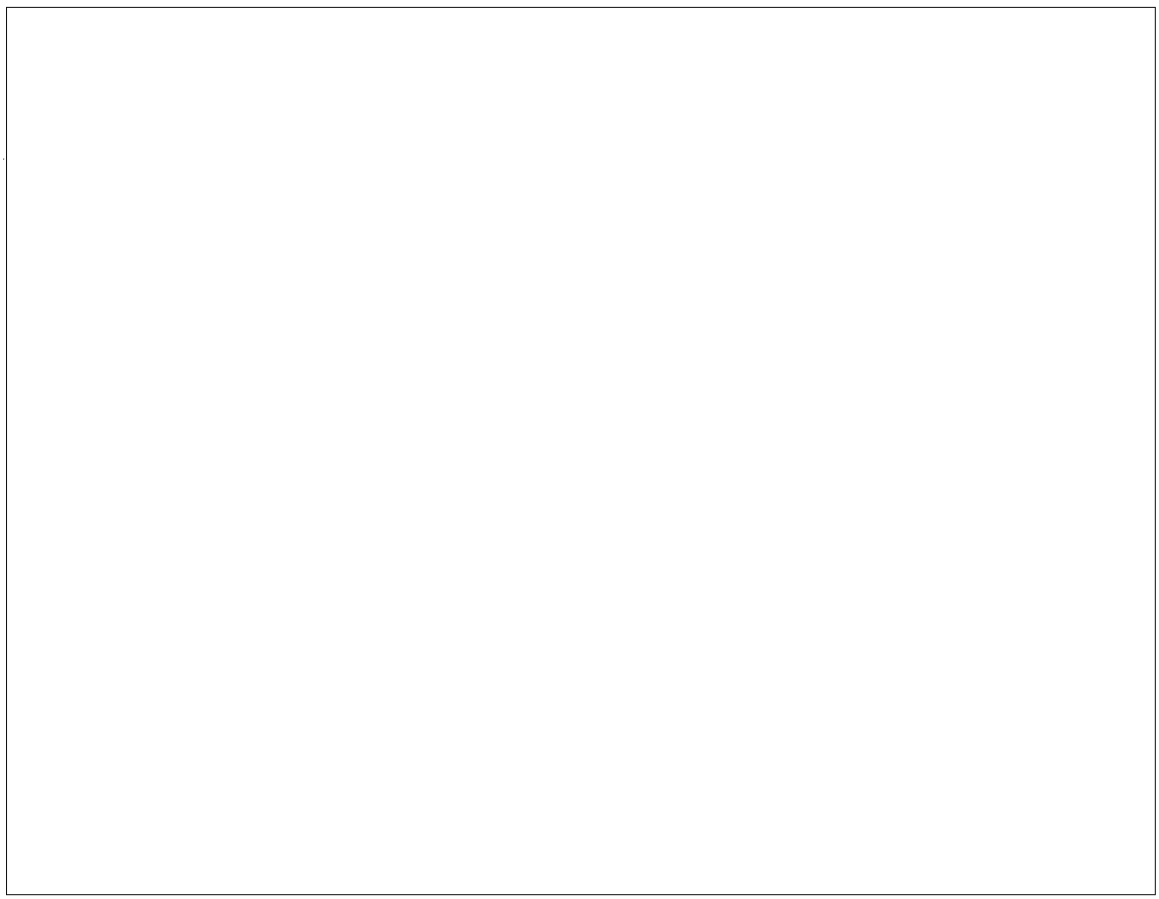

- **Recommendation III/3:**

  (U) Ensure that all staff are familiar with the schedules that cover the records they accumulate.

  CIA Response:

  (U//~~FOUO~~) A copy of the CIO/IMS Corporate Records Management Training Policy and Plan[1] has been included in the notebook (attachment #31).

  (U//~~FOUO~~) The CBT records management training provides guidance on the proper creation, preservation, and disposition of records. Our response to recommendation I/3 includes more details about the training provided by CIA IMOs (please see attachments #7-#12).

[1] The CIO/IMS Corporate Records Management Training Policy and Plan was previously referred to as the Corporate IM Training and/or Communication Plan in previous reports and the Milestones Matrix.

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(U//~~FOUO~~) An 18-month roll-out plan for PERM (attachment #32) was presented to the Agency Governance Board in March 2002. Also included are PERM training materials (attachment #33) that address user responsibilities to document official activities.

- **Recommendation III/4:**

(U) Work with NARA in the development of a revised schedule for DO operational project files; use this schedule as the basis for written guidance that is provided to those who review and/or process older operational files.

CIA Response:

(U//~~FOUO~~) Completion of this recommendation will require Agency-NARA discussions about the draft SF 115 for the Operational Activity (OPACT) Files (attachment #34). We have attached proposed language for the SF 115 (attachment #34).

- **Recommendation III/5a:**

(U) Ensure that all staff that create or maintain records are familiar with and properly apply existing agency guidance pertaining to what is a record and the record status of working files,

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CIA Response:

(U//~~FOUO~~) We have enclosed in the notebook the CIO/IMS Corporate IM Plan and Policy (attachment #31). You will note that the policy requires that IM training be presented in each Agency component annually.

(U//~~FOUO~~) Please refer to CIA responses to recommendations I/3 and III/3 and exemplars in the notebook (attachments #7-#12) for training on records management. We have also enclosed training materials for PERM (attachment #33). A description of working

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files is included in the Employee Bulletin (attachment #29) and also addressed in the CBT (attachment #6).

(U//~~FOUO~~) The CBT, currently in redesign, will cover all aspects of the Agency's records management program as well as the responsibilities of employees to originate, maintain, and preserve records. This uniform instruction will be delivered to the desktop of every Agency officer (staff and contract). Completion of the CBT program and associated test will be mandatory for every officer, annually. The CBT will form the nucleus of our annual records training, augmented by IMO-presented instruction on an as needed basis.

- **Recommendation III/5b:**

(U) Modify the description of working files included in the agency schedules so it incorporates the guidance in this regulation.

CIA Response:

(U//~~FOUO~~) Attached is a signed SF 115 (attachment #35) for CIA working files, the language for which has been coordinated with your agency. The treatment and disposition of working files will be included in the CBT and component instruction delivered by the IMO.

- **Recommendation III/6:**

(U) Treat as chron files only copies of outgoing correspondence maintained for ready reference. Chron files that are used as finding aids to other records should be disposed of or retained as indexes in accordance with NC1-263-85-1, Item 1e.

CIA Response:

(U//~~FOUO~~) Chronological files used as finding aids (indices) are retained for as long as the records to which they provide access. This is in keeping with NC1-263-85-1, Item 1e. and requisite items in the

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General Records Schedules. The following addresses questions in your 23 October 2001 letter.

(U//~~FOUO~~) Our Corporate IM Training Plan/Policy (attachment #31) and the CBT (expected for deployment in CY2002) all are parts of our communication plan to ensure that all employees (regardless of position or rank) understand their record keeping responsibilities, including the proper use and management of chronological files. Our communications plan is augmented by the issuance of notices, bulletins, and reminders to the Agency population periodically throughout the year.

(U//~~FOUO~~) The draft Employee Bulletin (attachment #17) will satisfy the requirements set forth in this recommendation. We will issue it upon your review.

(U//~~FOUO~~) With respect to component guidance, IMOs, based upon their assessment of the sufficiency of component records procedures, provide tailored briefings to employees to explain any deficiencies and detail the actions that need to be taken to avoid them in the future. Exemplars of that training have been included in the notebook (attachments #7-#12 and #33), along with a copy of the current CBT (attachment #6).

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- **Recommendation III/7:**

(U) Continue the project to apply correct schedule items to ARC accessions improperly retired as permanent; include NARA review as part of the process.

CIA Response:

(U//~~FOUO~~) As stated in recommendation II/6 above, the "Permanent/Temporary Job Quality Control/Preservation Checklist" (attachment # 26) is currently used at the ARC for accessioning both temporary and permanent records. Quality control of job contents is performed by the ARC on all non-restricted records; restricted records are reviewed by the Directorate IMOs.

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(U//~~FOUO~~) The Agency Archival Review Team (AART), [redacted] reviews and determines the appropriate action in those cases when the disposition of retired records is challenged. For example, the AART will review recommendations that temporary records due for destruction be kept longer. As necessary, the AART will recommend consultation with NARA and/or the submission of a SF 115 (to NARA) covering the records in question.

- **Recommendation III/8:**

(U) Work with NARA to develop transfer instructions for permanent records that reduce the age at which CIA records are typically accessioned by NARA, provide for the transfer of entire series (or chronological segments thereof), and take into account CIA plans to review files for declassification electronically.

CIA Response:

(U//~~FOUO~~) We acknowledge NARA's interest in the transfer of permanent records and will transfer them when they have no further business value. Moreover, we believe that the 25 year declassification program will assist us to identify records that no longer have a business use and can be transferred to NARA. In

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addition, where classification and security concerns are at issue, an IC affiliated archive may meet the needs of both NARA and the Agency. In the shorter term, we are proceeding in accordance with the process outlined in the memorandum, dated 19 March 2001, to the Executive and Deputy Directors from the Director of Information Management entitled "Identification of Agency Permanent 50-year old Records for Transfer to the National Archives." We plan to identify those records for transfer to you by the end of calendar year 2002.

- **Recommendation III/9:**

(U) Work with NARA to develop a timetable for the transfer of specific files to the National Archives, with the goal of transferring by the year 2003 most permanent files cut-off prior to 1961.

CIA Response:

(U//~~FOUO~~) We have enclosed the requested items Appendix C, "Form Letter for Submitting Response to This Request" (attachment # 37) and Appendix D, "Agency Transfer Plan" (attachment #38).

- **Recommendation IV/1:**

(U) Comply with NARA guidance contained in 36 CFR 1234 when electronic systems are developed, maintained, or upgraded. Of particular importance is the need to include migration strategies as part of the life cycle planning for electronic systems design and implementation.

CIA Response:

(U//FOUO) A copy of the Electronic Record Keeping System (ERKS) Requirements for Information Management System Certification is included in the notebook (attachment #25). This document provides a detailed discussion about the ERKS certification process and the requirement for a migration strategy for electronic documents. See ERKS manual, pages 5-11.

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(U//~~FOUO~~) Systems certified by the ERKS process are recorded in the Agency Catalog of Databases (CATDB). Each system will be validated against the process every five years or whenever changes are made to the system. The ERKS process involves writing an Information Management plan that addresses how records are to be migrated when records retention is likely to extend beyond the system life.

- **Recommendation IV/2b:**

(U) Ensure that SMART has the capability to retrieve special media records in the ARC.

CIA Response:

(U//~~FOUO~~) Enclosed is a copy of the AIRRS User's Guide (attachment #39), as you requested. The AIRRS system has been replaced by SMART, which inherited all of AIRRS' functionality. We have also attached the SMART User's Guide (attachment #40).

- **Recommendation IV/3:**

(U) Disseminate the Agency e-mail regulation to all Agency staff who use e-mail and monitor its implementation. Update this issuance as NARA develops new guidance concerning the maintenance and disposition of e-mail.

CIA Response:

(U//~~FOUO~~) In accordance with your request, we have enclosed

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draft Employee Bulletin entitled "Records Responsibilities of Employees and Managers" (attachment #17) that we will disseminate after your review. In addition, examples of records management training materials and a copy of our Computer Based Training on records and classification management are contained in the response to recommendation I/3 (attachments #6-12).

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- **Recommendation IV/4:**

(U) Complete the centralized catalog project so the Agency will have a comprehensive, Agency-wide inventory of electronic records. After the centralized catalog is completed, implement measures to keep it current as additional systems are developed.

CIA Response:

(U//~~FOUO~~) A new version of the Catalog of Databases (CATDB) was deployed on 21 February 2002 to the Agency directorates, DCI area, and MSO offices. CATDB provides an on-line, directorate/component specific inventory of databases.

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- **Recommendation IV/5:**

(U) Using the centralized catalog data as well as pre-existing inventories and lists, work with NARA to initiate and carry out a project to ensure that all CIA electronic record systems are eventually covered by NARA-approved schedules.

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(U) This effort should begin as soon as possible, using existing inventory information, and should encompass the review and coordination with NARA of housekeeping systems to determine which are covered by the GRS and which are not. Develop schedules for non-GRS records, beginning with those that pertain to CIA's core missions and are the most likely to be appraised as permanent.

CIA Response:

(U//~~FOUO~~) We are unaware of records, maintained in any system, that are not already scheduled in an existing Agency-approved RCS and GRS-20 (attachment #45). The Agency will seek disposition authority for any electronic system in the event that the (electronic) records are not or cannot be output to an approved electronic recordkeeping system, paper, or microform for recordkeeping purposes.

- **Recommendation V/1:**

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CIA Response:

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- **Recommendation VI/1:**

(U) Issue specific guidance concerning the creation, maintenance, and disposition of non-textual records that incorporates NARA guidance. This can be done either through a separate issuance or by incorporating

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guidance into the appropriate records management regulation

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CIA Response:

(U//~~FOUO~~) We have reviewed the February 28, 2001, Employee Bulletin (EB) entitled "Non-Textual Records Preservation" (attachment #29). It includes a reference to each of the audiovisual records types cited in 36 CFR 1228.266 and NARA's publication "Managing Audiovisual Records (Second Edition). However, we have modified the EB to include specific reference to the CFR and NARA publications on the preservation of audiovisual records. The changes in the EB are underlined, and we will re-issue it subsequent to your review (attachment #46).

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- **Recommendation VI/2:**

(U) Use formats that conform to 36 CFR 1232.30 for permanent and unscheduled video recordings.

CIA Response:

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We have included the Employee Bulletin entitled "Non-Textual Records Preservation" with the CFR citation on preservation of permanent and unscheduled video recordings (attachment #46). IMOs have and will continue to take NARA and university courses that provide instruction on the preservation of all record types. Both the ARC and the component IMOs are sensitive to preservation issues for all record types, including video recordings. IMOs routinely review how their components handle and store video recordings.

- **Recommendation VI/3:**

(U) Inventory non-textual records and develop schedules for all unscheduled series as well as

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specific schedule items for certain major collections now covered by generic authorities as identified in this report

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CIA Response:

(U//~~FOUO~~) We believe that the General Records Schedule and the NARA approved Agency specific schedules cover our non-textual records,

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(U//~~FOUO~~) Per your 17 October 2000 letter, we note NARA's concern about submitting a records control schedule without first conducting an inventory. The Agency File Plan incorporates existing records control schedules in a taxonomic view that supports our records management program. Any new or unscheduled records series will be documented and submitted to NARA, via SF 115, for a disposition authority. The file plan will be amended, thereafter, to include the new series. Regarding comments made in your initial report about specific records collections:

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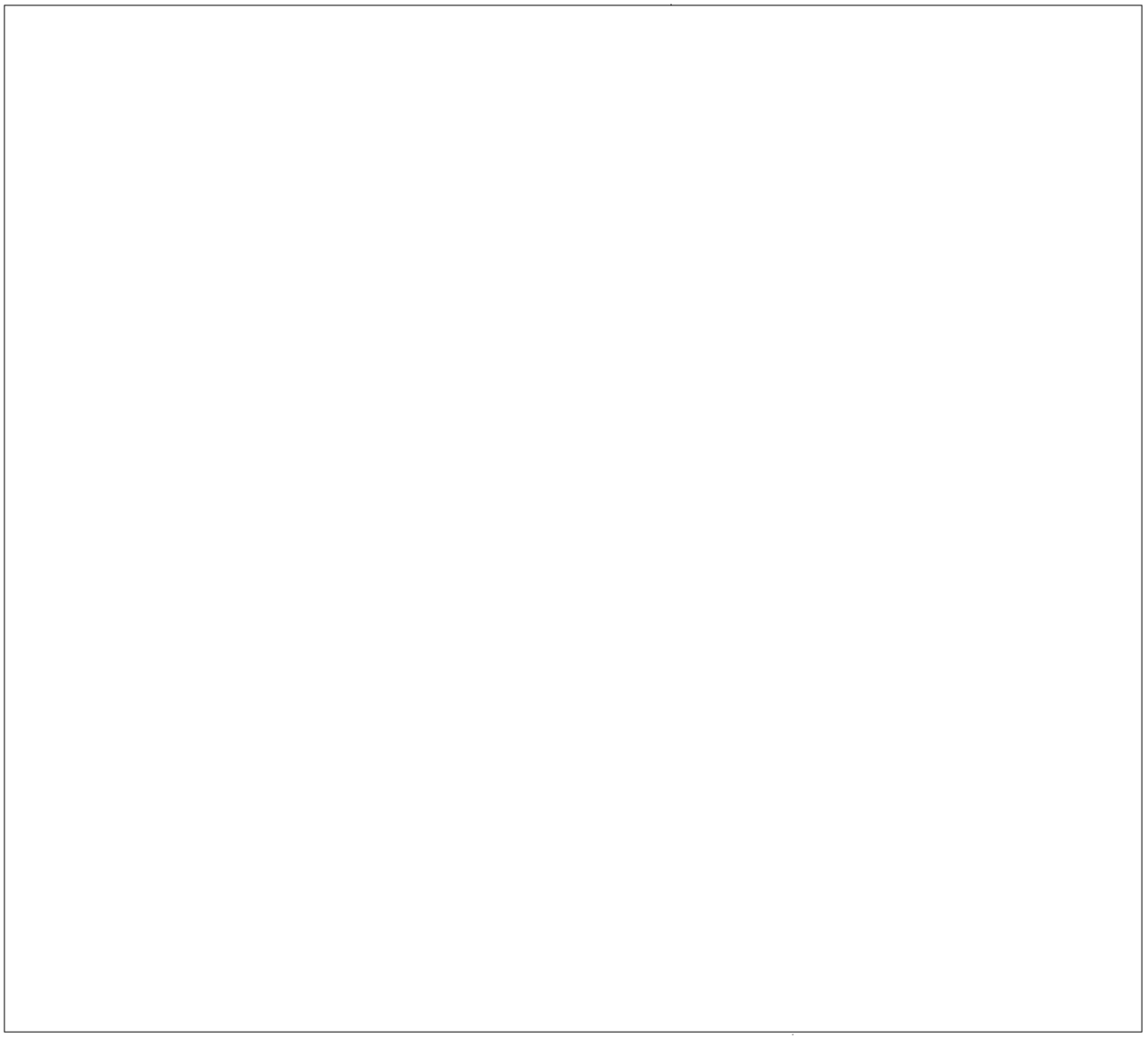

- **Recommendation VI/4a:**

  (U) Modify schedules to accelerate the transfer of non-textual records to NARA custody.

  CIA Response:

  (U//~~FOUO~~) In line with our response to recommendation III/8 above, we continue to examine ways to make permanent textual and non-textual transfers to NARA custody. In addition, we believe that our 25-year declassification program will allow us to identify collections that can be transferred to NARA on an accelerated basis.

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- **Recommendation VI/4b:**

(U) Immediately transfer the OSS map collection to NARA.

CIA Response:

(U//~~FOUO~~) In response to the nine items described in your letter dated 12 March 2001 and designated "Records Scheduled as Permanent on the OSS Schedules but not Transferred," we are able to provide additional information regarding the disposition of four of the items. We were unable, however, to locate the remaining five items. Our findings for each of the nine items are summarized below.

(U//~~FOUO~~) Item 8, CIA Job 57-93 - Organizational Charts used by the OSS and SSU for planning of a central intelligence service. We have located these records. While technically these are OSS records, their content deals with the organization and operations of the Counterintelligence Group (CIG)--the organization that succeeded OSS. We plan to review these records prior to transferring them to NARA to determine if any sensitive CIA equities are involved in this material.

(U//~~FOUO~~) Item 82, OSS Research and Development Production Records. The Agency's Record Center has no record of CIA Job 78-3760. An Accession Job number was not provided by NARA.

(U//~~FOUO~~) Item 83, OSS Map Records. The Form 258 for Accession Job Number NN3-226-85-2 makes no reference to Item 83. No CIA Job Number was provided.

(U//~~FOUO~~) Item 98, General John Magruder--Record Private Papers. The Form 258 for Accession Job Number NN3-226-85-2 makes no reference to Item 98. No CIA Job Number was provided.

(U//~~FOUO~~) Item 102, Miscellaneous Top Secret Reports File. The Agency's Record Center has no record of Job Number 60-749. The Form 258 for Accession Job Number NN3-226-85-2 makes no reference to Item 102.

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(U//~~FOUO~~) Item 106, CIA Job 61-949 -- Strategic Services Unit Liaison Control of Records. These records were transferred to NARA under CIA Job 80-168. Item 106 records were incorporated into box 4 of this job.

(U//~~FOUO~~) Item 115, OSS Miscellanous Records. The form 258 for Accession Job NN3-226-85-2 makes no reference to Item 115. No CIA Job Number was provided.

(U//~~FOUO~~) Item 122, CIA Job 62-S-460 -- Washington OSS Communications Records. Agency records indicate that these records were destroyed in May 1980. Attempts to reconstruct the events leading to their disposition proved inconclusive because information incidental to the destruction records is retained for only five years.

(U//~~FOUO~~) Item 125, CIA Job 65-S-72 -- Washington OSS Communications records. The Agency transferred these records to the National Security Agency for disposition on 25 May 1997. During a comprehensive review of OSS records in 1997, Agency file reviewers determined that this collection was mislabeled as OSS material. They concluded that these records were actually part of the VENONA collection of intercepts acquired from NSA in the 1950s.

- **Recommendation VI/5:**

(U) Develop and implement a plan to preserve non-textual series that must remain in CIA custody for more than 10 years. Include upgrading storage conditions in the ARC to meet NARA standards for the storage of permanent non-textual records, copying permanent records maintained on obsolete media to contemporary formats, and the review of the ARC's non-textual holdings to identify accessions in need of preservation action. Particular attention should be paid to locating non-textual records contained in accessions retired to the ARC prior to 1978.

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CIA Response:

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(U//~~FOUO~~) The notebook includes copies of [redacted] the February 28, 2001, Employee Bulletin (EB) entitled "Non-Textual Records Preservation" (attachment #29), that detail the steps and activities associated with preservation and disposition of Agency records.

(U//~~FOUO~~) There is no report, per se, that is generated or required documenting improper preservation of records transmitted to the ARC. Rather, corrective action is taken directly by ARC personnel (using the preservation checklist) or returned to the component IMO for remediation. Except for fungus on microfiche, we are unaware of any damage to records maintained at the ARC. The damaged microfiche has been isolated from other film products. Once copied to an archival medium, the damaged microfiche will be destroyed.

We believe that the ARC renovation meets NARA regulations for a records center and invite you to inspect the facility.

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